

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

ALIBAHAR	:	CASE NO. C-1-01-798
Plaintiff	:	J. Bertelsman
v.	:	<u>DEFENDANT'S EXHIBIT</u>
	:	<u>LIST</u>
CITY OF CINCINNATI,	:	
Defendant	:	

In accord with the Court's pretrial order, Defendant states it may present the following exhibits at trial:

EXHIBITS OF DEFENDANT

Designation	Description	Identified/Admitted
DX2000	EIT Job Analysis Questionnaire	
DX2001	Salary Grade/Step Schedule (EIT)	
DX2002	8/18/00 Memo to CSC from Julia Johnson	
DX2003	EIT Classification Specifications	
DX2004	CSC Minutes re: Change of EITs	
DX2005	CSC Minutes re: Bahar Appeal	
DX2006	MSD Form 9 re: Personnel Action	

Designation	Description	Identified/Admitted
DX2007	CHIS Job Summary	
DX2008	CSC Rules (R.10, 11, 47, 49, 51, 52)	
DX2009	7/19/88 New Employee Checklist	
DX2010	6/17/88 Memo to J. Johnson	
DX2011	5/18/88 Interview Notes	
DX2012	7/10/00 Notice of Official Reprimand	
DX2013	7/24/00 Bahar Memo	
DX2014	7/25/00 Bahar Memo	
DX2015	8/22/00 Chapman Memo	
DX2016	8/16/00 Bahar Letter to Reece	
DX2017	8/18/00 Bahar E-mails	
DX2018	8/24/00 Bahar E-mail	
DX2019	Public Records Request (0020-0037)	
DX2020	8/13/99 Karney E-mail	
DX2021	12/12/01 Danepudi E-mail	
DX2022	6/5/00 Memo re: Employees Working Out of Classification	

Designation	Description	Identified/Admitted
DX2023	11/2/99 Memo re: MSD Policy	
DX2024	8/01/00Danepudi E-mail	
DX2025	5/03/01 Bahar E-mail	
DX2026	4/23/01 Bahar E-mail	
DX2027	Updated Letter from Bahar to Shirey	
DX2028	4-5-99 Slavin Letter to Bahar	
DX2029	6-16-00 Karney E-mail	
DX2030	1-16-2002 Bahar Letter 0071-0072	
DX2031	8-28-00 Bahar Letter to CSC	
DX2032	8-24-00 Bahar E-mail	
DX2033	9-7-99 Bahar Memo to Huang	
DX2034	3-25-99 J. Johnson Memo	
DX2035	2-22-93 Nuxoll Memo re: Project Managers	
DX2036	3-23-00 Shirey Memo & Ordinance	
DX2037	4-3-00 Krings Letter to Bahar	
DX2038	1-19-87 Perkins Letter to Bahar	

Designation	Description	Identified/Admitted
DX2039	7-15-99 Karney Letter to Roberson	
DX2040	4-27-00 Karney Memo to Shirey	
DX2041	6/97 Non Discrimination Handbook	
DX2042	MSD Career Path FlowSheet	
DX2043	5-24-01 CSC Minutes	
DX2044	3-15-01 CSC Minutes	
DX2045	5-1-01 Bahar Facility Manager Application	
DX2046	5-18-01 Shepard Letter to Bahar	
DX2047	5-24-01 Callahan Memo re: Schmidt	
DX2048	1-26-01 Public Record Request	
DX2049	2-9-01 Minges Memo to Bahar, Kim, St. John	
DX2050	3-29-00 Bahar Letter to Krings	
DX2051	00871-884 Bahar EEOC Complaint	
DX2052	00924 Bahar EEOC Complaint	
DX2053	Bahar EEOC Affidavit	
DX2054	Bahar EEOC Affidavit re: Retaliation	

Designation	Description	Identified/Admitted
DX2055	2-22-01 Bahar E-mail	
DX2056	2-15-01 Karney Letter re: M. Umberg	
DX2057	2-14-01 Karney Letter re: S. Moisio	
DX2058	2-14-01 Karney Letter re: B. George	
DX2059	9-7-00 Bahar E-mail re: Leadership #3	
DX2060	9-06-00 Bahar E-mail to D. Chapman	
DX2061	8-10-99 MSD Reorganization Memo	
DX2062	4-10-00 Campbell E-mail to Niemeyer	
DX2063	8-28-00 Chapman E-mail to Bahar	
DX2064	7-14-00 Bahar Memo to Campbell	
DX2065	7-13-00 Campbell Memo to Bahar	
DX2066	11-16-99 Bahar Memo to Rahtz	
DX2067	8-14-00 Bahar E-mail to Kesterman	
DX2068	4-17-00 Campbell E-mail to T. Huang	
DX2069	3-24-00 Bahar E-mail to T. Huang 1258-1259	
DX2070	3-15-00 Bahar E-mail to T. Huang 1260-1261	

Designation	Description	Identified/Admitted
DX2071	3-15-00 Flanders E-mail to Bahar	
DX2072	3-14-00 Huang E-Mail to Bahar	
DX2073	3-13-00 Huang E-mail to B. Campbell	
DX2074	4-10-00 Corr. R. Cambell to P. Karney	
DX2075	3-20-00 Memo to B. Campbell from WWE	
DX2076	2-7-00 Karney Memo to Bahar	
DX2077	4-20-98 Bahar Corr & Argument to B&V	
DX2078	2-7-02 Bahar Diary ("BD")	
DX2078	3-14-02 Bahar Diary	
DX2079	3-22-02 Bahar Diary	
DX2078	2-27-01 BD	
DX2079	2-28-01 BD	
DX2080	11-12-99 BD	
DX2081	11-15-99 BD	
DX2082	12-6-99 BD	
DX2083	12-8-97 BD	

Designation	Description	Identified/Admitted
DX2084	4-19-96 BD	
DX2085	7-6-00 Campbell E-mail to T. Huang	

Respectfully submitted,

JULIA L. McNEIL (0043535)
City Solicitor

/s/ Terrance A. Nestor
AUGUSTINE GIGLIO (0031911)
TERRANCE A. NESTOR (0065840)
Sr. Assistant City Solicitor
Room 214 City Hall
801 Plum Street
Cincinnati, Ohio 45202
Ph. (513) 352-3334
Trial Attorney for the Defendant
Terry.Nestor@Cincinnati-oh.gov

CERTIFICATE OF SERVICE

I hereby certify on October 18, 2004 a true and accurate copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system and copies will be mailed to those parties who are not served via the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Terrance A. Nestor
TERRANCE A. NESTOR (0065840)